

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

IN RE:	)	CASE NO. 22-51030 JPS
	)	
CHARLES MICHAEL BLIZZARD	)	
	)	
DEBTOR	)	CHAPTER 7
	)	
CHARLES MICHAEL BLIZZARD	)	
	)	
MOVANT	)	
	)	
VS.	)	
	)	
DISCOVER BANK	)	
	)	
RESPONDENT	)	

**NOTICE OF MOTION TO AVOID LIEN**

CHARLES MICHAEL BLIZZARD FILED DOCUMENTS TO AVOID YOUR JUDGMENT LIEN.

**YOUR RIGHTS MAY BE AFFECTED.** You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. **If you do not have an attorney, you may wish to consult one.** If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion may be obtained upon written request to counsel for the Movant or at the Clerk's office.

If you do not want the Court to grant the motion to avoid lien or if you want the court to consider your views on the motion, then you or your attorney shall file with the court a written objection or response on or before **October 18, 2022** pursuant to Fed.R.Bankr.P.9006(f). If you are receiving this notice by mail, you may add 3 days to the response date stated above. The objection or response should be sent to:

Clerk, U.S. Bankruptcy Court, Middle District of Georgia, P.O. Box 1957, Macon, GA 31202 (478) 752-3506

**If an objection or response is filed a hearing on the motion shall be held on November 3, 2022 at 9:30 a.m. in Courtroom A of the United States Bankruptcy Court, 433 Cherry Street, Macon, GA 31201.**

*Parties should consult the Court's website ([www.gamb.uscourts.gov](http://www.gamb.uscourts.gov)) concerning whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order #145 for more guidance.*

If you mail your response or objection to the court for filing, you shall send it early enough so the court will receive the objection or response on or before the date stated above.

Any response or objection shall also be served on the movant

**If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

This notice is sent by the undersigned pursuant to M.D. Ga. LBR 9007-1.

This **27th** day of **September, 2022.**

Akin, Webster & Matson, P.C.  
P.O. Box 1773  
Macon, GA 31202  
(478) 742-1889  
[rmatson@akin-webster.com](mailto:rmatson@akin-webster.com)

/s/ Robert M. Matson  
Robert M. Matson  
Attorney for Debtor/Movant  
State Bar No. 477102

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**MOTION TO AVOID LIEN**

The Movant, under the authority of 11 U.S.C. § 522(f), moves the Court for an Order avoiding the following lien:

1.

A judicial lien in favor of the Respondent arising from a judgment entered in the Superior Court of Monroe County, Georgia in Case No. SUCV2022000122 with an amount due of \$11,956.76.

2.

This lien impairs the exemptions to which the Movant is entitled to in this proceeding, and there is no excess equity in any property to which the judicial lien could attach. For these reasons, the judicial lien referred to above should be voided by the Court.

WHEREFORE, the Movant prays that the Court consider this matter and issue an Order voiding this lien.

This 27th day of September, 2022.

Akin, Webster & Matson, P.C.  
P.O. Box 1773  
Macon, GA 31202  
(478) 742-1889  
[rmatson@akin-webster.com](mailto:rmatson@akin-webster.com)

/s/ Robert M. Matson  
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Robert M. Matson  
Attorney for Debtor/Movant  
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**CERTIFICATE OF SERVICE**

This certifies that I have this day served a copy of the Notice of Motion to Avoid Lien and the Motion to Avoid Lien on **Walter W. Kelley**, via CM/ECF electronic notice and on **Discover Bank**, Attn: Roger Hochschild, CEO, 502 E. Market Street, Greenwood, DE 19950 via certified mail.

This 27th day of September, 2022.

Akin, Webster & Matson, P.C.  
P.O. Box 1773  
Macon, GA 31202  
(478) 742-1889  
rmatson@akin-webster.com

/s/ Robert M. Matson  
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